

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

**FILED**  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
OCT 08 2014  
DAVID J. MALAND, CLERK  
BY DEPUTY \_\_\_\_\_

UNITED STATES OF AMERICA

§

§

v.

§

§

CRYSTAL CATRELL PULLIAM

§

Case No. 4:14CR 156  
Judge Schell

**INFORMATION**

THE UNITED STATES ATTORNEY CHARGES:

**Count One**

Violation: 18 U.S.C. § 1349  
(Conspiracy to Commit Bank Fraud)

**A. Introduction**

1. Wells Fargo Bank, Bank of America, First Financial Bank, and Independent Bank (collectively “financial institutions”) were financial institutions insured by the Federal Deposit Insurance Corporation.

2. ML, MK, AC, KS, and AB were individuals known to the United States Attorney; each had their cars burglarized and their bank cards, bank checks and/or personal identification information stolen. JJ, DM, KO, AD, and JE were individuals known to the United States Attorney.

**B. The Conspiracy**

3. Beginning in or about January 2012, and continuing through on or about July 1, 2013, in the Eastern District of Texas and elsewhere, **Crystal Catrell Pulliam** (“**Pulliam**”), defendant, intentionally, knowingly and willfully conspired, confederated, and agreed with JJ, DM, KO, AD, JE and other individuals both known and unknown to the United States Attorney to devise a scheme and artifice to defraud and obtain money and property from the financial institutions by means of materially false and fraudulent pretenses and representations, a violation of 18 U.S.C. § 1344.

**C. Manner and Means of the Conspiracy**

4. In the Eastern District of Texas and elsewhere, KO and other members of the conspiracy, known and unknown to the United States Attorney, stole bank checks, bank cards, and personal identification cards at locations such as daycare facilities, gyms, and public parks. The thefts were typically from motor vehicles and were made via forcible entry.

5. Victims’ bank cards were typically used within minutes of the theft, often at gas stations, convenience stores, or retail stores.

6. **Pulliam** and other members of the conspiracy rented vehicles that were used in the conspiracy as discussed in the below two paragraphs.

7. AD and other members of the conspiracy, disguised as theft victims often through the use of wigs, visited financial institutions, typically via the drive-thru teller

lanes, using rented vehicles. Other members of the conspiracy, including JE, were usually hidden in the back seat of the rented vehicles and provided the co-conspirators, including AD, with the stolen checks. AD and other co-conspirators presented stolen checks, with the corresponding stolen drivers' licenses and bank cards, made payable from one victim to another. Bank tellers cashed the checks and the payee victims' banks suffered the loss when the checks were returned from the maker victims' banks as stolen.

8. Throughout the execution of the scheme, JJ and DM, and other members of the conspiracy, known and unknown to the United States Attorney, provided surveillance for the rental vehicles used to present the stolen checks to the financial institutions, typically in other rented vehicles.

9. On or about the following dates, as representative of the manner and means of the conspiracy, **Pulliam** and other co-conspirators known and unknown to the United States Attorney took the following actions, among others, in the Eastern District of Texas and elsewhere:

a. On or about October 20, 2012, in Grapevine, Texas, unknown members of the conspiracy broke into ML's vehicle and stole ML's Wells Fargo Bank checks and personal identifying information.

b. On or about January 17, 2014, in Dallas, Texas, unknown members of the conspiracy broke into AC's vehicle and stole AC's Wells Fargo Bank checks and personal identifying information.

c. On or about March 15, 2014, **Pulliam** rented a gray Lincoln MKZ bearing Texas license plate CPB6872 in the name of AT from Avis Budget Group. **Pulliam** fraudulently obtained a Navy Federal Credit Union credit card in the name of AT, and used it to rent the vehicle.

d. On or about April 5, 2014, in Irving, Texas, unknown members of the conspiracy broke into MK's vehicle and stole MK's Bank of America checks and personal identifying information.

e. On or about April 22, 2014, in Highland Park, Texas, unknown members of the conspiracy broke into AB's vehicle and stole AB's Wells Fargo Bank checks and personal identifying information.

f. On or about the following dates, in the Eastern District of Texas and elsewhere, unknown members of the conspiracy drove the gray Lincoln MKZ bearing Texas license plate CPB6872 that was rented by **Pulliam** into the drive thru lane of the following banks and presented the following victims' stolen bank checks in the following amounts:

Date	Victim	Check No.	Amount	Bank	Locations in Texas
04/09/2014	ML	2117	\$3,400	First Financial Bank	Trophy Club (EDTX)
04/09/2014	ML	2118	\$3,400	First Financial Bank	Boyd
04/09/2014	ML	2120	\$990.83	Bank of America	Murphy (EDTX)
04/09/2014	ML	2122	\$997.75	Bank of America	Dallas
04/09/2014	ML	2123	\$997.50	Bank of America	Dallas
04/09/2014	ML	2124	\$2,000	First Financial Bank	Southlake
04/09/2014	ML	2125	\$3,200	First Financial Bank	Grapevine
04/10/2014	MK	1465	\$3,400	First Financial Bank	Southlake
04/10/2014	MK	1466	\$3,500	First Financial Bank	Grapevine
04/10/2014	MK	1467	\$3,500	First Financial Bank	Trophy Club (EDTX)

Date	Victim	Check No.	Amount	Bank	Locations in Texas
04/10/2014	MK	1468	\$3,500	First Financial Bank	Keller
04/10/2014	MK	1469	\$3,500	First Financial Bank	Burleson
04/10/2014	MK	1470	\$3,500	First Financial Bank	Alvarado
04/11/2014	AC	567	\$3,500	First Financial Bank	Southlake
04/11/2014	AC	569	\$3,500	First Financial Bank	Keller
05/30/2014	AB	1138	\$1,300	Independent Bank	McKinney (EDTX)

g. On or about April 24, 2014, **Pulliam** rented a silver Infiniti Q70 bearing Texas license plate CWR1873 in the name of AM from Avis Budget Group. **Pulliam** fraudulently obtained a Bank of America credit card in the name of AM, and used it to rent the vehicle.

h. On or about June 21, 2014, in Plano, Texas, in the Eastern District of Texas, an unknown co-conspirator driving the silver Infiniti Q70 bearing Texas license plate CWR1873 rented by **Pulliam** broke into KS's vehicle and stole KS's personal identification information.

In violation of 18 U.S.C. § 1349.

### **Count Two**

Violation: 18 U.S.C. § 1029(a)(2)  
(Using an Unauthorized Access Device)

Between on or about May 1, 2014, and May 30, 2014, in the Eastern District of Texas and elsewhere, **Pulliam**, knowingly and with the intent to defraud, used one or more unauthorized access devices during any one-year period, such access devices being obtained with the intent to defraud, including a Wells Fargo Bank credit card in the name of SW, and by such conduct, obtained items totaling \$6,200, said use affecting interstate

commerce, in that the credit card transactions were processed by financial institutions which conduct business in interstate commerce.

In violation of 18 U.S.C. 1029(a)(2).

**NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE**

Pursuant to 18 U.S.C. §§ 981(a)(1)(C), 982(a)(2)(B), 1029(c)(1)(C),  
and 28 U.S.C. § 2461(c)

As the result of committing the offenses alleged in this Information, the defendant shall forfeit to the United States pursuant to 18 U.S.C. §§ 981(a)(1)(C), 982(a)(2)(B), 1029(c)(1)(C), and 28 U.S.C. § 2461(c) all property, real or personal, that constitutes or is derived from proceeds traceable to the aforementioned offenses, or was involved in or used to facilitate the aforementioned offenses. All such property is forfeitable to the United States.

Respectfully submitted,

JOHN M. BALES  
UNITED STATES ATTORNEY



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	§	
CRYSTAL CATRELL PULLIAM	§	

**NOTICE OF PENALTY**  
**Count One**

Violation: 18 U.S.C. § 1349  
(Conspiracy to Commit Bank Fraud)

Penalty: A fine of not more than \$1,000,000, and/or  
imprisonment for not more than 30 years,  
and a Term of Supervised Release for not more  
than 5 years.

Special  
Assessment: \$100.00

**Count Two**

Violation: 18 U.S.C. § 1029(a)(2)  
(Using or Trafficking in an Unauthorized Access Device)

Penalty: A fine of not more than \$250,000 or twice the  
gross pecuniary gain to the defendant or twice  
the gross loss to the victims, and/or  
imprisonment for not more than 10 years, and a  
Term of Supervised Release for not more than 3  
years.

Special  
Assessment: \$100.00